

Application No. 10/607,914  
Amendment "A" dated March 28, 2006  
Reply to Office Action mailed December 28, 2005

### REMARKS

The First Office Action, mailed December 28, 2005, considered and rejected claims 1-22. Claims 1-4, 6-11 and 15-18 were rejected under 35 U.S.C. 102(b) as being anticipated by Ferguson (U.S. Patent No. 6,016,499). Claims 5, 12 and 19-21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ferguson as applied to claims 1-4, 6-11 and 15-18 above and further in view of Srinivasan (U.S. Patent No. 6,587,856). Claim 22 was rejected under 35 U.S.C. 103(a) as being unpatentable over Ferguson in view of Glebov (U.S. Patent No. 6,343,265).<sup>1</sup>

By this paper, claims 1-3, 5, 7, 9, 13, 16, 17 and 22 have been amended, claims 14 and 19-21 have been cancelled, and new claim 23 has been added, such that claims 1-13 and 15-23 remain pending, of which claims 1, 16 and 22 are the relevant independent claims at issue.<sup>2</sup>

The pending claims are generally directed to embodiments for facilitating and providing access to a data repository from an application. As clarified by this paper, the repository can include any combination of relational databases and directory services. The data resident in the repository, which is organized according to an implicit or explicit schema, defines at least one schema class and attribute. As further clarified, the application utilizes object oriented programming that includes an object class and an object property that have a different format than the corresponding schema classes and attributes.

The method recited in claim 1, for example, includes receiving from the application, at an interface interposed between the application and the repository, an access command, wherein the access command identifies an object class and an object property of the object class in a format specific to the application and that is different than a format utilized by the repository to define a corresponding schema class and schema attribute. The interface also translates the access command to a translated access command, wherein the translated access command identifies the

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<sup>1</sup> Although the prior art status and some of the assertions made with regard to the cited art is not being challenged at this time, inasmuch as it is not necessary following the amendments and remarks made herein, which distinguish the claims from the art of record, Applicants reserve the right to challenge the prior art status and assertions made with regard to the cited art, as well as any official notice, which was taken in the last office action, at any appropriate time in the future, should the need arise, such as, for example in a subsequent amendment or during prosecution of a related application. Accordingly, Applicants' decision not to respond to any particular assertions or rejections in this paper should not be construed as Applicant acquiescing to said assertions or rejections.

<sup>2</sup> The claim amendments and new claims are supported by the disclosure found in at least paragraphs 5-6 and 32-34 of the specification.

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schema class and the schema attribute corresponding to the object class and the object property of the application. The translated access command is then transmitted to the repository to obtain access to the repository.

The method recited in claim 16 is directed to a corresponding interface and the mapping tool recited in claim 22 is directed to a corresponding user interface for performing the mapping that is utilized by the interface.

There were many rejections made in the first office action regarding the drawings and §112 issues.<sup>3</sup> Applicants respectfully submit, however, that these rejections are now moot in view of the foregoing amendments made to the claims and specification, as shown above.

Now, with regard to the substantive rejections, Applicants also submit that the amended claims are neither anticipated by nor made obvious by the cited art of record.

While Ferguson (the primary reference) is generally directed to embodiments for enabling access to directory service repositories, Ferguson clearly fails to disclose or suggest embodiments for accessing repositories (comprising any combination of any combination of relational databases and directory services) by translating, through an interface interposed between an application and the repository, access commands that identify an object class and an object property of the object class in a format specific to the application and that is different than a format utilized by the repository to define a corresponding schema class and schema attribute.

In fact, Ferguson is more specifically directed to translating relational database function calls into directory service repository calls (Col. 8, ll. 43-50; Col. 9, ll. 15-21; Col. 10, ll. 50-54) and such that the relational "database tools such as report generators to work with the information stored in the [directory service] repository." (Col. 5, ll. 34-36; See also Col. 4, ll. 59-64 and Col. 8, ll. 26-27).

It will also be noted that although Ferguson discloses both repositories and databases, the repositories are clearly defined as directory services<sup>4</sup>, and while Ferguson's "repositories and databases may be distributed...the 'databases' and 'repositories' are not interchangeable..." Col. 2, ll. 15-19. Accordingly, it should be appreciated that while Ferguson does appear capable of

<sup>3</sup> The rejections to the drawings have been overcome by adding relevant reference numerals to the specification to correspond to the reference numerals that were identified by the Examiner in the drawings as failing to have corresponding references in the specification. The language objected identified in the §112 rejections has also been amended or cancelled to provide clarity and such that the Examiner's concerns are now moot.

<sup>4</sup> Col. 2-4.

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translating one type of repository command into another type of repository command (database commands into directory service commands), Ferguson does not teach or disclose translating application access commands for accessing any type of repository, including any combination of databases and directory services, wherein the translation wherein the translated access command identifies the schema class and the schema attribute corresponding to an object class and an object property that were included in the access command from the application.

Ferguson also fails to disclose or suggest that an interface or mapping tool is provided for enabling a user to select object classes to be mapped to selectable schema classes and for receiving a user selection of at least one selectable object class and at least one selectable schema class from the graphical user interface, as recited in claim 22. This is particularly true when considering that the selectable object and schema classes are presented in a first graphical user interface and wherein a second graphical user interface is provided for user-selection of at least one selectable property of a selected object class and at least one selectable attribute of a selected schema class, in combination with the other recited claim elements.

The Examiner appears to acknowledge this and has turned to Srinivasan as purportedly teaching the graphical user interface elements that are clearly missing from Ferguson. Applicants respectfully submit, however, that Srinivasan also fails to disclose or even suggest a mapping tool that provides first and second interfaces, wherein the first enables a user to select object classes to be mapped to selectable schema classes, and wherein the second graphical user interface is provided for user-selection of at least one selectable property of a selected object class and at least one selectable attribute of a selected schema class, as recited in claim 22 with the other recited claim elements. This is particularly true when considering the embodiment recited in claim 23, wherein the second interface is only provided after the user first selects the classes from the first interface.

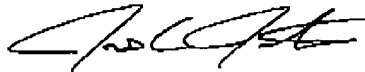
For at least the foregoing reasons, Applicants respectfully submit that the pending claims, as recited in the independent claims for example, are neither anticipated by or made obvious by the cited art of record. Accordingly, the remaining rejections of record are now moot, such that the dependent claims and rejections to the dependent claims do not need to be addressed at this time. Nevertheless, Applicants reserve the right to challenge the asserted rejections at a later time, including any official notice, as appropriate.

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In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 28 day of March, 2006.

Respectfully submitted,



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